

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ALBERT PATINO, et al., §
 §
Plaintiffs, §
 §
v. § Civil Action No. 4:14-cv-03241
 §
CITY OF PASADENA, et al., §
 §
Defendants. §

ORAL DEPOSITION OF

BILL RIVES

February 12, 2016

ORAL DEPOSITION OF BILL RIVES, produced as a witness at
instance of the Plaintiffs and duly sworn, was taken in the
e-styled and numbered cause on February 12, 2016, from
a.m. to 12:17 p.m., before Amanda Plano, CSR in and for
State of Texas, reported by machine shorthand, at Mexican
ican Legal Defense and Education Fund, 110 Broadway, Suite
San Antonio, Texas, pursuant to the Federal Rules of
Procedure and the provisions stated on the record or
ched hereto.

1 is so close at 2014 and here we are two years later.

2 Q. Would you agree that the most recent five-year ACS
3 estimate for Hispanic CVAP in the City of Pasadena is also
4 below 50 percent like the 2014 one-year estimate?

5 A. It is, but it's older.

6 Q. Understood. Okay. Now, we've gone over your
7 conclusions at the bottom of page 9 and the top of page 10.
8 Can you show me anywhere else in your report where you offer a
9 conclusion or an opinion?

10 A. The conclusions on the bottom of page 9 and page 10
11 are my -- my general -- excuse me -- my general conclusions. I
12 have more detailed or specific conclusions along the way with
13 respect to the use of school enrollment data, for example, over
14 the last 20-some-odd years to -- to track the vote of Hispanic
15 enrollment in particular in the city.

16 And I've also taken advantage of the -- of the
17 three most recent Censuses, '90, 2000 and 2010 to get some idea
18 of -- of the growth of Hispanic citizenship over that 20-year
19 period, even though we stopped at 2010, but those numbers for
20 the most part are field count, at least the base populations
21 are.

22 And I also taken advantage of the block level
23 Hispanic VAP and Hispanic citizen VAP data that we have for
24 '90, 2000 and 2010, because I wanted to show that the growth in
25 the city is not concentrated. The growth in the city is really

1 citywide. And -- and you can see in some of the exhibits I
2 have, the spread of Census blocks where Hispanic are a majority
3 of the share of eligible voters, as well as the majority of the
4 voting age population.

5 Q. Would it be fair to say then that your opinions are
6 expressed in the two bullet points on the bottom of page 9 and
7 the bullet point at the top of page 10, and that the remainder
8 of the discussion in your report is a discussion of data and
9 analysis that supports the three conclusions that you offer at
10 the end of the report?

11 A. That's a good summary.

12 Q. Thank you. Is it correct to say that you did not
13 perform an analysis of the city's previous eight single-member
14 district election plan?

15 A. I did not. That's correct.

16 Q. And so you don't offer an opinion on how many of
17 those previous eight single-member districts were majority
18 HCVAP or SSVR, correct?

19 A. No, I don't -- I don't have an opinion. I wasn't
20 asked to look at that.

21 Q. Okay. And you don't have an opinion regarding how
22 many of the districts in the eight single-member district plan
23 offered Hispanic voters the opportunity to elect their
24 candidate of choice, correct?

25 A. I wasn't asked to look at that either.

1 Q. Would it also be fair to say that you can't offer an
2 opinion about whether any of the eight single-member districts
3 became more or less Hispanic in the change to the 6-2 mixed
4 system?

5 A. That's correct. I haven't -- I haven't looked at
6 that.

7 Q. And then finally -- no, no more finally. Strike
8 that.

9 Okay. Now, I'm going to ask you to look at some
10 parts of your report. And specifically, I'd like you to turn
11 to Exhibit 1, which is an absolutely beautiful map. Can you
12 tell me what we see in Exhibit 1, please.

13 A. This was a map that I put in for orientation purposes
14 in the city, and it was available for the current city council
15 districts. And so they're -- they're numbered on there. But I
16 really was more interested in having the orientation for the
17 city. And there's a -- a table that follows as Exhibit 2 which
18 provides some summary information on the -- on the districts.

19 Q. Is it fair to say that Exhibit 1 is a map showing the
20 six single-members districts in the City of Pasadena
21 redistricting plan with a shading for each district?

22 A. That's correct.

23 Q. Okay. Now, I'd like you to turn with me to
24 Exhibits 4-A and 4-B. Tell me what the shading represents in
25 this -- in these maps that we're looking at in Exhibit 4-A and

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1	CHANGES AND SIGNATURE		
2	WITNESS NAME: BILL RIVES		February 12, 2016
3	PAGE/LINE	CHANGE	REASON
4	11 / 14	"Vote" should be "growth"	Grammar correction
5	20 / 3	Both uses of "it" should be "I"	Grammar correction
6	21 / 2	First "that" should be "than"	Grammar correction
7	29 / 4	"stead" should be "steady"	Spelling correction
8	30 / 3	"Underline" should be "underlying"	Grammar correction
9	31 / 23	"moment in the end" should be "momentum"	Grammar correction
10	46 / 3	"fix plan" should be "fixed plant"	Grammar correction
11	53 / 16	"with" should be "within"	Spelling correction
12	64 / 3	"2013" should be "2015"	Date correction
13	65 / 10	Insert "it at" between "developed" and "the"	Grammar correction
14	67 / 5	"coated" should be "coded"	Grammar correction
15	76 / 20	"2010" should be "2015"	Date correction
16	91 / 21	"Server" should be "Sample"	Grammar correction
17	96 / 21	"channel" should be "challenge"	Grammar correction
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1 I, BILL RIVES, have read the foregoing deposition and
 2 hereby affix my signature that same is true and correct, except
 3 as noted above.

4 
 5 AKA Bill Rives

BILL RIVES

Norfleet W. (Bill) Rives

9 THE STATE OF TEXAS)

10 COUNTY OF _____)

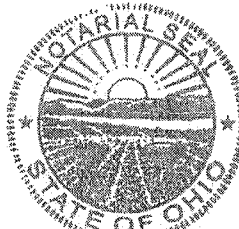
11
 12 Before me, _____, on this day personally
 13 appeared BILL RIVES, known to me [or proved to me on the oath
 14 of _____ or through _____ (description of
 15 identity card or other document)] to be the person whose name
 16 is subscribed to the foregoing instrument and acknowledged to
 17 me that he executed the same for the purposes and consideration
 18 therein expressed.

19 (Seal) Given under my hand and seal of office this _____
 20 day of _____, 2016.

21 STATE OF OHIO
 22 COUNTY OF FRANKLIN

23 Sworn to (or affirmed) and subscribed before me
 24 this 29th day of March, 2016, by Bill Rives

25 Diana M. Magee DIANA M. MAGEE
 Notary Public's Signature Notary Name
 Personally Known OR
 Type of Identification Produced License



Diana M. Magee
 Notary Public, State of Ohio
 My Commission Expires 03-30-2020

Notary Public in and for
 the State of Texas

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REPORTER'S CERTIFICATION

DEPOSITION OF BILL RIVES

February 12, 2016

I, AMANDA PLANO, Certified Shorthand Reporter in and for
the State of Texas, hereby certify to the following:

That the witness, BILL RIVES, was duly sworn by the
officer and that the transcript of the oral deposition is a
true record of the testimony given by the witness;

I further certify that pursuant to FRCP Rule 30(f)(1),
that the signature of the Deponent was requested by the
Deponent or a party before the completion of the deposition and
is to be returned within 30 days from date of receipt of the
transcript.

If returned, the attached Changes and Signature Page
contains any changes and the reason therefore;

That the amount of time used by each party at the
deposition is as follows:

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Ms. Nina Perales - 2:47
Mr. C. Robert Heath - 0:00

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Certified to by me this 1st day of March, 2016.



AMANDA PLANO, CSR, RPR
Texas CSR 8713
Expiration Date: 12/31/16
Kim Tindall & Associates, LLC
Firm Registration No. 631
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San Antonio, Texas 78232
Telephone: (866) 672-7880